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Michael B. Sellman
President and CEO

October 2, 2001

Ms. Carol Hanlon
U.S. Department of Energy
Yucca Mountain Site Characterization Office (M/S #025)
P.O. Box 30307
North Las Vegas, Nevada 89036-0307

Subject: Nuclear Management Company comments on the Possible Site
Recommendation for Yucca Mountain

Dear Ms. Hanlon:

Nuclear Management Company (NMC), on behalf of its member utilities, is pleased to submit these comments to the Department of Energy (DOE) on the Possible Site Recommendation for Yucca Mountain (66 Fed. Reg. 43,851 – August 21, 2001 and 66 Fed. Reg. 45,845 – August 30, 2001). NMC also strongly endorses the comments submitted by the Nuclear Energy Institute on behalf of the entire nuclear energy industry.

NMC strongly supports a decision to recommend Yucca Mountain for development as a repository for the commercial used nuclear fuel produced by our generating stations. The Department's *Preliminary Site Suitability Evaluation (PSSE)* and underlying reports thoroughly substantiate the sound science supporting a Yucca Mountain site recommendation which has been evaluated against comprehensive repository criteria. NMC strongly supports the consensus of the international scientific community who concludes that geological disposal remains the only scientifically and technically credible long term solution available. NMC believes that a positive site recommendation is good energy and environmental policy and strongly encourages the President and Congress to approve the Yucca Mountain site recommendation and proceed with the NRC licensing process to facilitate construction and operation of the Yucca Mountain site.

In addition, NMC needs to stress DOE's statutory obligation to dispose of used nuclear fuel as mandated by the Nuclear Waste Policy Act (NWPA) of 1982, as amended. NMC continues to store used nuclear fuel in temporary storage casks at our plant sites due to DOE's inability to fulfill its statutory obligations. Although this temporary storage solution is entirely safe, it represents an unnecessary financial burden to NMC plants and their ratepayers who are being forced to pay twice for the management of used nuclear fuel due to DOE's failure to comply with federal law. DOE **must** continue to make progress on the

Yucca Mountain program and start meeting its statutory obligations to remove fuel from NMC sites. DOE's lack of performance on the program increases costs for NMC sites.

NMC would be pleased to address any questions the DOE may have concerning these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Sellman". The signature is fluid and cursive, with the first name "Mike" and last name "Sellman" clearly distinguishable.

Michael B. Sellman
President and CEO
Nuclear Management Company, LLC